

**FOX ROTHSCCHILD LLP**

**Formed in the Commonwealth of Pennsylvania**

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Attorneys for Defendants

Eugene J. Callaghan, John Gloistein,

and E & J Agency, Inc.

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

BROWNSTONE AGENCY, INC. and  
MURPHY & JORDAN,

Plaintiff,

vs.

EUGENE J. CALLAGHAN, JOHN  
GLOISTEIN, E & J AGENCY, INC.

Defendants.

Civil Action No. 1:08-cv-522(LTS)(FM)

ECF CASE

**DEFENDANTS' SUPPLEMENT TO THE  
NOTICE OF REMOVAL**

TO: Timothy J. Dunn, III, Esq.  
Rebore, Thorpe & Pisarello, P.C.  
500 Bi-County Blvd., Suite 214 N,  
Farmingdale, New York 11735

**COUNSEL:**

In accordance with the Court's February 1, 2008 Initial Conference Order, defendants Eugene J. Callaghan, John Gloistein, and E & J Agency, Inc. (hereinafter referred to as "Defendants") hereby submit this Supplement to the Notice of Removal.

1. All defendants were served on Friday, January 18, 2008. All defendants joined in the removal of this action.
2. The Notice of Removal was filed on January 22, 2008, within thirty days after the first defendant was served.
3. None of the defendants are a resident of the State of New York. As is set forth in the removal papers, the two individual defendants (Eugene J. Callaghan and John Gloistein) are citizens of the State of New Jersey. The corporate defendant (E & J Agency, Inc.) is incorporated in and has its principal place of business in the State of New Jersey.
4. As was set forth in the removal papers, to the best of Defendants' knowledge, Plaintiff Brownstone Agency is incorporated in the State of New York and have their principal places of business at 32 Old Slip, New York, New York.
5. In addition, Murphy & Jordan is a limited liability company organized under the laws of the State of New York with its registered address at 199 Water Street, 7<sup>th</sup> Floor, New York, New York 10038. Murphy & Jordan only has two members: John Cassara (51%) and Eugene P. Murphy (49%).
6. To the best of Defendants' knowledge, John Cassara resides at 12 Wildwood Ct., Locust Valley(Lattingtown), New York.
7. To the best of Defendants' knowledge, Eugene P. Murphy resides at 9025 Terranova Drive, Naples, Florida.

FOX ROTHSCHILD, LLP  
Attorneys for Defendants, Eugene J. Callaghan,  
John Gloistein and E & J Agency, Inc.

By:  \_\_\_\_\_  
DONIA SAWWAN

Dated: February 13, 2008

**CERTIFICATE OF SERVICE**

On this date, I served a true copy of the attached:

**DEFENDANTS' SUBMISSION PURSUANT TO  
THE INITIAL CONFERENCE ORDER**

to Plaintiffs to the following address via Federal Express:

Timothy J. Dunn, III, Esq.  
Rebore, Thorpe & Pisarello, P.C.  
500 Bi-County Blvd., Suite 214 N,  
Farmingdale, New York 11735

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 13, 2008

  
DONIA SAWWAN